REMARKS

Claims 6-23 are pending in the present application. Reconsideration of the pending Claims is respectfully requested in view of the following remarks.

Telephone Interview

Applicant thanks the Examiner for the courtesies extended during the telephonic interview of June 26, 2007 in which the objection to Figure 3 was discussed. It was agreed that amended Figure 3 filed with the office action response mailed January 12, 2007 was acceptable. Claims 6-23, and U.S. Patent No. 6,233,618 to Shannon were also discussed. No agreement was reached regarding the present rejections of claims 1-23, however, the Examiner indicated that he better understood the claimed features of the invention following the discussion, and would carefully consider the discussed distinguishing limitations of the claims when such distinguishing limitations were described in a written response by the Applicant.

Drawings

Figure 3 was objected to for having hand written legends. As agreed during the telephone interview, the replacement drawing for Figure 3 mailed on January 12, 2007 was acceptable since there were no handwritten legends included on the replacement sheet. Thus, a replacement drawing for Figure 3 is not necessary. Applicant respectfully requests withdrawal of the objection to Figure 3.

Claim Rejections pursuant to 35 U.S.C. §102(b)

Claims 6-15, 18-21, and 23 were rejected pursuant to 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,233,618 to Shannon. Applicant respectfully traverses these rejections on the grounds that Shannon does not describe each and every limitation described in the presently pending claims, as discussed with the Examiner during the telephone interview.

Claims 6-11

Claim 6 describes registering in a memory of a communication terminal a plurality of portal sites and a corresponding plurality of access points used to access the portal sites, and

performing access control that comprises denying access in response to the site being the registered portal site, or a first portal site that shares an access point with the registered portal site.

Contrary to the assertions on page 3 of the office action mailed April 19, 2007, Shannon does not describe such access points, nor registration in a memory of a communication terminal of portal sites and corresponding access points. To the contrary, Shannon describes a network device that is interconnected between a first network and a second network and "serves as a 'gateway' through which all data communications must pass between the two networks." Col. 5 lines 61-63 Clearly, Shannon's gateway is not a plurality of corresponding access points used to access portal sites as described in Claim 6. To the contrary, Shannon's network device is "an access control mechanism for all data information requests made from clients to servers." Col. 5 lines 16-18

Even if Shannon's network device could somehow to be construed as equivalent to access points, Shannon does not describe registering in a memory of a communication terminal portal sites and corresponding access points as described in Claim 6. To the contrary, Shannon's network device is a gateway for *all* requests made by clients, and cannot possibly be registered in memory as <u>corresponding</u> access points of portal sites since Shannon fails to describe that a network device corresponds to anything registered in a memory of a communication terminal.

In addition, Shannon does not describe denying access in response to a site being a first portal site that shares an access point with a registered portal site as described in Claim 6. To the contrary, Shannon simply describes that his network device attempts to match an IP address or a URL included in a request to stored restricted destination information, and denies access when a match is found. Col. 14 lines 26-32 Shannon fails to even consider if a portal site shares anything with another portal site, and thus quite clearly fails to consider denying access in response to a site being a first portal site that <u>shares an access point</u> with a portal site registered in a memory of a communication terminal as described in Claim 6. It follows that Shannon also cannot describe transmitting a request in response to a site being a second portal site that <u>does not</u> share an access point with a portal site registered in a memory of a communication terminal as also described in Claim 6.

Further, Claim 7 describes identifying additional portal sites associated with an access point of a portal site registered in a memory of a communication terminal. Contrary to the assertion on page 4 of the office action mailed April 19, 2007, not only does Shannon's network device fail to even consider access points of portal sites registered in a memory of a

communication terminal, but also, quite clearly does not identify additional portal sites associated with an access point of the registered portal site as described in Claim 7.

Claims 12-15 and 17-18

Claim 12 describes instructions stored in a memory of a communication terminal that are executable by a processor to deny transmittal of a request by the communication terminal in response to a uniform resource locator being related to a portal site of a service provider that is associated with an access point used to access the portal site, or to another portal site associated with the access point. Shannon, on the other hand, describes a network device, as previously discussed, but fails to describe or suggest a portal site of a service provider that is associated with an access point as described in Claim 12. On page 5 of the office action mailed April 19, 2007, it was apparently asserted that Shannon's network device and access control database include equivalent instructions to those described in Claim 12.

If one accepts this assertion for purposes of discussion, it is immediately apparent that Shannon's network access device does not deny transmittal of a request by a communication terminal in response to a URL being related to another portal site associated with an access point that is associated with a portal site of a service provider as described in Claim 12. To the contrary, Shannon's network device, upon receipt of a URL, simple checks Shannon's access control database to see if the same URL is stored therein. Col. 14 lines 26-37 Clearly, restricting access when a received URL matches a stored URL as described by Shannon, is entirely different from denial of transmittal of a request in response to a uniform resource locator being related to another portal site associated with an access point as described in Claim 12. In sharp contrast to the limitations described in Claim 12, Shannon fails to describes a portal site associated with an access point, and very clearly does not describe consideration of the association of multiple portal sites with the same access point when denying or permitting transmission of a request.

In addition, Claim 14 describes instructions stored in the memory that are executable by the processor to read from the memory an access point and a domain name that correspond to the portal site. Shannon, on the other hand fails, to be concerned with, nor describe or suggest instructions to read from memory an access point that corresponds to a portal site. To the contrary, any teaching or suggestion regarding storage of an access point that corresponds to a portal site is completely absent from Shannon. It follows that Shannon cannot possible describe or

suggest instructions stored in the memory that are executable by the processor to identify another domain name of another portal site that corresponds to the access point, since Shannon is complete silent on access points, or association of one or more portal sites with such access points.

Claim 17 describes that the application of Claim 12 comprises a native application and a downloaded application, and that the instructions stored in memory that are executable by the processor to deny transmittal of the request are only executable when the request is generated from the downloaded application. In sharp contrast, Shannon makes no distinction between downloaded and native applications, and clearly does not teach or suggest denial of transmittal of a request only when the request is generated from a downloaded application as described in Claim 17. In addition, Claim 18 describes that instructions stored in memory that are executable by the processor to transmit the request are executable unconditionally in response to only the request when the request is generated from the native application. Not only does Shannon fail to teach or describe any transmittal instructions that are unconditional, but also Shannon is completely silent regarding unconditional transmittal when a request is generated from a native application as described in Claim 18.

Claims 19-21 and 23

Claim 19 describes a communication terminal. On page 7 of the office action mailed April 19, 2007 it was asserted that "Shannon discloses a communication terminal (integration of items 50-53 and network device 100 via item 41 [network link], see Fig. 1." Applicant respectfully traverses that a number of client computer hosts, a network device, a Lan, and a network link as described by Shannon can be "integrated" in order to anticipate the communication terminal as described in Claim 19. Firstly, Claim 19 describes a communication terminal, not a number of discrete pieces of hardware and an interconnecting LAN as described by Shannon. To anticipate a claim pursuant to 35 U.S.C. §102, "the identical invention must be shown in as complete a detail as is in the ....claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989) and see MPEP 2131. Clearly that is not the case when an "integration" of a conglomeration of network device is asserted as anticipating the claimed invention.

Secondly, even if one overlooks the improper rejection formulated by "integration" of components in a network in order to anticipate Claim 19, the asserted "integration" still fails to describe profiles stored in memory that each include an identifier of a provider portal site and a

corresponding identifier of an access point operable to communicate with other communication networks as described in Claim 19. To the contrary, Shannon describes a database that stores categories that include document locations and IP addresses (Table 3 in Col. 8), which clearly does not include storage of a provider portal site <u>and</u> a <u>corresponding</u> identifier of an access point as described in Claim 19.

Further, Claim 19 describes a display unit operable to receive a user input representative of selection of one of the profiles stored in the memory as a communication route for connection of the communication terminal to a provider server apparatus that corresponds to the selected one of the profiles. On page 8 of the office action, it was asserted that Shannon's browser was equivalent, however, Shannon's browser is not described as receiving a user input representative of selection of one of a plurality of profiles stored in the memory of the communication terminal as a communication route as described in Claim 19. To the contrary, Shannon clearly describes that browsers operable on a client computer allow users to request a web page (Col. 12 lines 31-34), which is not a stored profile, and clearly does not constitute selection of one of the profiles as a communication route as described in Claim 19.

In addition, Claim 19 describes an application manager stored in the memory and executable to determine a first provider portal site that is associated with the identifier of the access point of the selected one of the profiles, and to designate as inhibited sites each of the first provider portal site, and a second provider portal site identified in the selected one of the profiles. Shannon, on the other hand, not only fails to describe determination of any portal site that is associated with an identifier of an access point, but also clearly does not describe determination of a provider portal site that is associated with an identifier of an access point selected from one of a plurality of stored profiles as described in Claim 19. In fact, Shannon is complete silent with regard to any form of stored profiles as described in Claim 19.

Claim 20 describes that the identifier of the access point of the selected one of the profiles is also present in another one of the profiles that includes the first provider portal site. Since Shannon does not describe stored profiles or access points, Shannon cannot possibly describe an identifier of an access point in a selected one of the profiles is also present in another one of the profiles as described in Claim 20.
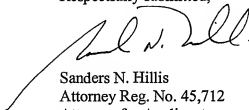
The 35 U.S.C. §103(a) Claim Rejections

Claims 15, 16 and 22 were rejected pursuant to 35 U.S.C. §103(a) as being unpatentable over Shannon in view of U.S. Patent Publication 2003/0112182 to Bajikar (hereinafter referred to as "Bajikar"). Applicant respectfully traverses these rejections because all of the limitations described in Claims 15, 16 and 22 are not taught, suggested, or disclosed by the cited prior art, either alone or in combination.

Specifically, Claim 15 describes that the application is stored in read only memory, and the domain name and another domain name are stored in random access memory. Bajikar describes read only memory and random access memory, however neither Shannon nor Bajikar teach or suggest storage of an application in read only memory and storage of domain names in random access memory as described in Claim 15. In addition, Claim 16 describes that the application is a downloaded application stored in non-volatile memory. Neither Shannon nor Bajikar teach or suggest a downloaded application stored in non-volatile memory as described in Claim 16. Further, Claim 22 describes that the memory comprises a non-volatile memory and a random access memory, the downloaded application and the profiles stored in the non-volatile memory, and the designation of the inhibited sites stored in the random access memory.

Neither Shannon nor Bajikar teach or suggest a downloaded application and profiles that are stored in non-volatile memory, and a designation of inhibited sites stored in random access memory as described in Claim 22. In fact, the office action mailed April 19, 2007 does not assert that Shannon nor Bajikar meet these limitations, but rather simply disregards the limitations completely. Accordingly, it is respectfully requested that the rejection of Claims 15, 16 and 22 be withdrawn as improper. (See MPEP 707 and 37 CFR §1.104(b) and 37 CFR §1.104(c))

Thus, for at least the foregoing reasons, none of the cited references either alone or in combination teach, suggest or describe all the limitations of Claims 6-23. The presently pending claims of this application are allowable over the cited references, and Applicant respectfully requests the Examiner to issue a Notice of Allowance for this application. Should the Examiner deem a telephone conference to be beneficial in expediting allowance/examination of this application, the Examiner is invited to call the undersigned attorney at the telephone number listed below.

Respectfully submitted,

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